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Before the FEDERAL COMMUNICATIONS COMMISSION JAN 27 1993 Washington, D.C. 20554

FEDERAL COMMUNICATIONS GOMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Administration of the North American Numbering Plan

CC Docket No. 92-237 Phase II

REPLY COMMENTS OF BELLSOUTH CORPORATION AND BELLSOUTH TELECOMMUNICATIONS, INC.

BellSouth Corporation and its telephone operating company BellSouth Telecommunications, Inc. ("BellSouth"), hereby file reply comments on Phase II (expansion of Feature Group D access codes) of the Notice of Inquiry (NOI) released by the Commission in the above-captioned docket.

I. SUMMARY

Comments filed in this proceeding show broad based industry support for the expansion of Feature Group D Carrier Identification Codes (CICs) from three to four digits. Indeed, working under the aegis of the Industry Carriers Compatibility Forum (ICCF), the industry recently reached consensus on CIC assignment guidelines which assume that the four-digit expansion plan will be implemented. A copy of those guidelines is attached to these reply comments as Exhibit 1.

While some commenters have questioned the need to implement four-digit Feature Group D CICs, none has advanced

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Comments of BellSouth p. 21, NYNEX p. 6, Southwestern Bell p. 10 and AT&T p. 9.

an alternative plan which meets the needs of the industry.² The industry has already spent considerable time and effort investigating the feasibility of developing a better alternative, only to conclude in effect that none exists.³ If we are to avoid exhaust of CIC resources, it is time for the industry to cease the debate and to move forward with implementation.

Given the significant lead time needed to arrange for financing and for equipment and systems modifications needed to accommodate Feature Group D expansion, the Commission should move quickly to settle any remaining question as to whether such expansion plan is in the public interest. In particular, the Commission should initiate a rulemaking and, after public comment and any appropriate modifications, ratify the proposed expansion plan, find the CIC assignment guidelines (Exhibit 1) to be in the public interest, and settle any related issues which remain unresolved.

II. THE COMMISSION SHOULD CONDUCT A RULEMAKING TO ENSURE TIMELY AND EQUITABLE IMPLEMENTATION OF THE FOUR-DIGIT FEATURE GROUP D EXPANSION PLAN.

² Comments of Whidbey Telephone Company, NTCA p. 2, Ad Hoc p. 34-38.

³ Comments of BellSouth p. 19-20, Ameritech p. 5, Pacific Telesis p. 8, SNET p. 6, Southwestern Bell p. 10 and AT&T n.15.

⁴ BellSouth had previously suggested that the Commission imitate a rulemaking to address CIC issues by the end of calendar year 1992. <u>See</u>, Comments of BellSouth, DA 91-1307, filed December 20, 1991, at p. 4.

In comments filed in response to the petition which triggered this NOI, BellSouth called for a rulemaking to address CIC issues following completion of this NOI and ICCF action on developing CIC guidelines. At that time, BellSouth foresaw a need for the Commission to address questions such as what are the appropriate assignment guidelines for four-digit CIC codes, the extent to which carriers and other access customers will be allowed to retain CIC codes in excess of agreed upon industry guidelines, the extent to which the Commission intends to enforce such guidelines, and who will pay the costs of expanding CIC resources. Based upon the comments filed in response to this NOI, BellSouth still sees a need for such a rulemaking.

A. The Commission Should Resolve Industry

Disagreement Over The Length Of The Permissive

Dialing Period Associated With The Feature Group D

Expansion Plan.

The Feature Group D expansion plan calls for a permissive dialing period following the introduction of expanded Feature Group D dialing arrangements during which both three-digit and four-digit CICs could be used. After the permissive dialing transition period, only four-digit

⁵ <u>See</u>, Comments of BellSouth, DA 91-1307, at p. 3-4.

^{6 &}lt;u>Id</u>.

⁷ Exhibit 1, p. 5, Section 2.2.

codes could be used. The permissive dialing period is needed to allow for an orderly transition (e.g., customer education and CPE adjustments) from 10xxx to 101xxxx dialing.

Industry consensus was <u>not</u> reached on the length of the permissive dialing period. The absence of industry agreement on this point is reflected in the comments, 9 as well as in the industry approved CIC quidelines. 10

In its comments, NANPA states that it:

[o]pted for an eighteen month permissive transitional period, concluding that disparate dialing arrangements could improperly favor existing service providers with 3-digit CICs over new assignees, and invited those who disagreed with this conclusion to bring the matter to the FCC. To date, NANPA's decision has not been challenged.¹¹

As previously noted, however, at least a few carriers are challenging this decision. Absent action by the Commission, it is questionable whether the 18 month permissive dialing period can be established given the voluntary nature of the guidelines and NANPA's absence of any enforcement authority to require compliance with those guidelines.

The time is ripe for the Commission to resolve the permissive dialing issue. Commission action is particularly

⁸ Bellcore Comments, n.4.

Omments of Bellcore n.4, Ameritech p. 3-4, AT&T p. 8-9.

¹⁰ Exhibit 1, p. 5, Section 2.2.

¹¹ Comments of NANPA n.4.

appropriate in that the resolution of this issue involves the equal access and competitive equity policies of the Commission.

The NANPA has urged the Commission not to reopen this issue. While NANPA operates independently from Bellcore's owners and is entitled to its own opinion, in BellSouth's view this issue has never been closed. As explained above, the issue remains unresolved and the NANPA lacks authority to resolve it in a manner that requires anything other than the voluntary cooperation of those current access customers who clearly oppose discontinuing the use of their existing three-digit CIC arrangements. Consequently, BellSouth urges the Commission to address this issue in a rulemaking proceeding; not to reopen the issue but to settle it.

B. The Commission Should Decide Whether Pay Telephone
And Other Call Aggregators And Related Equipment
Manufacturers Should Be Required To Accommodate
Four-Digit Feature Group D Access Codes.

Certain commenters representing pay telephone providers, call aggregators and related equipment manufacturers complain that these entities should not be required to undergo the expense of modifying their equipment to accommodate four-digit Feature Group D access codes. 13 While these commenters are correct in their view that existing CIC resources should be used efficiently, the fact

¹² NANPA Comments n.11.

¹³ Comments of American Public Communications Council, Intellicall and NATA.

remains that expansion of this finite resource will ultimately be necessary. It seems appropriate for the Commission to decide whether special circumstances warrant such an exception.

BellSouth is unable to discern from the comments the degree to which the alleged expense and burden placed upon these parties is any different from that which is placed upon any other service provider which accommodates four-digit Feature Group D access codes. BellSouth is skeptical that these parties will be able to demonstrate that their circumstances warrant special treatment. Nonetheless, if these commenters can justify such an exception, then certainly the industry needs to know whether to plan for that exception. Accordingly, this issue should also be addressed and settled in a rulemaking proceeding.

C. The Commission Should Issue An Order Determining
The CIC Assignment Guidelines That Are In The
Public Interest.

Industry participants need to know for purposes of their operations, planning, and service and systems development whether they can rely upon the CIC guidelines agreed to by the industry. All service providers have an interest in deferring the additional inconvenience and expense associated with expanding CIC resources. If reasonable limits on the assignment of CICs are not established and honored, the industry could soon find itself

having to once again expand beyond the four-digit CIC expansion plan. 14

BellSouth believes a ruling by the Commission would bring some regulatory certainty to and help facilitate cooperation among industry interests concerning CIC assignment and allocation issues. Such action is also needed in view of the many comments filed in Phase I of this proceeding questioning the impartiality of the NANPA in administering numbering matters. A public interest finding by the Commission will spare NANPA and Bellcore's owners from having to defend against inevitable and groundless claims that attempts to follow the CIC guidelines are motivated by anti-competitive concerns.

¹⁴ See, e.g., Comments of NARUC p. 5-6.

III. CONCLUSION

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For the above reasons, BellSouth urges the Commission to promptly initiate a rulemaking to ratify the four-digit Feature Group D expansion plan, to validate the CIC assignment guidelines agreed to by the industry along with any appropriate adjustments, and to resolve any remaining Feature Group D access code issues.

Respectfully submitted,

BELLSOUTH CORPORATION and BELLSOUTH TELECOMMUNICATIONS, INC.

Bv:

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January 27, 1993

ICCF

Industry Carriers Compatibility Forum

Under the auspices of the Carrier Liaison Committee

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August 14, 1992

ICCF Participants

The attached "Carrier Identification Code (CIC) Assignment Guidelines" are a product of Industry consensus reached under the aegis of the Industry Carriers Compatibility Forum (ICCF). They were accepted at Session 26 of the ICCF in July.

The Guidelines represent extended commitment and cooperation on the part of the many industry sectors involved in their development.

Should you have any questions regarding these Guidelines, please contact me.

Sincerely,

M. M. Bogdan **ICCF Moderator**

MMB - bti

Attachment

Copy to Margaret Burngarner - CLC Chairperson Ron Conners - NANP Administration Gaston Daillaire - DOC Al Lewis - Chairman, CSCN Peyton Wynns - FCC

ICCF Industry Carriers Compatibility Forum

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CARRIER IDENTIFICATION CODE

(CIC)

ADMINISTRATIVE GUIDELINES

CIC Workshop

Co-Chairs

Mike Bennett Southwestern Bell

> Bob Hirsch AT&T

June 11, 1992

CARRIER IDENTIFICATION CODE ASSIGNMENT GUIDELINES

1.0 INTRODUCTION

1.1 Purpose

This document describes guidelines for the assignment of Carrier Identification Codes (CICs) in World Zone 1 and is a product of industry consensus reached under the aegis of the Industry Carriers Compatibility forum (ICCF). The document will be maintained by the ICCF which will, therefore, be responsible for the determination of any necessary changes or updates. These guidelines do not detract from the ability of an appropriate governmental or regulatory agency to exercise authority over any and all issues herein. These guidelines and future changes to these guidelines will be submitted to the agencies for their review. In addition, it should be understood that these guidelines supersede any previously issued CIC assignment guidelines.

These guidelines have been formulated with consideration of the following two legitimate needs. First, the recognition that the CICs represent a finite resource and should, therefore, be used efficiently and conserved to the extent possible; and second, that their prudent use is inherent in the provision of telecommunications services. Therefore, the guidelines should offer the greatest latitude in the provision of telecommunication services, while maintaining the effective management of a finite resource.

The assignment practices detailed in these guidelines apply to the assignment of CICs made directly by the North American Numbering Plan Administrator (NANPA) to a specific entity. (See Section 3.2 for CIC application procedures). Therefore, the maximum number of CICs an entity may be assigned under these guidelines pertains to the number of CICs the administrator may directly assign to that entity. Accordingly, codes obtained via means other than direct assignment by the NANPA are outside the scope of these assignment guidelines and hence, are not included in the maximum code assignment limits. The requirements specified in these guidelines will apply to all CICs (e.g., the access and usage requirements for retaining CICs) regardless of the manner through which an entity obtained a code.

1.2 Definition and Use of CICs

CICs are numeric codes which are currently used to identify customers who purchase Feature Group B (FG B) and/or Feature Group D (FG D) access services.* These codes are primarily used for routing from the local exchange network to the access purchaser and for billing between the LEC and the access purchaser.

CICs exist in the public domain, and as such, are a public resource. Assignment of a CIC to an entity in no way implies or infers ownership of the public resource by the entity. The availability of CICs will be monitored by the CIC administrator who will report on the continued assignment of this public resource on a regular basis to the FCC and the ICCF.

In addition to the use of CICs by the LECs for routing and billing of access, the CIC comprises part of the Carrier Access Code (CAC), a dialing sequence used by the general public to access a preferred provider of service.

Specifically, the CAC can be in the following formats:

- For FG B, the CAC is presently in the format 950-WXXX, where XXX is the FG B CIC, W = 0 or 1 (an option to be determined by the entity upon CIC assignment), and X = 0 through 9. At some future, pre-designated time, FG B CICs will be expanded to four digits and the CAC will be in the format 950-XXXX where XXXX is the four digit CIC.
- For FG D, the CAC is presently in the format 10XXX, XXX is the FG D CIC, and X = 0 through 9. At a future, pre-designated time, FG D CICs will be expanded to four digits and the CAC will be in the format 101XXXX (note that the CAC will be expanded from 5 to 7 digits), where XXXX is the four digit FG D CIC.

1.3 Definition of an Entity

CICs are assigned to access customers or industry entities. For purposes of these guidelines, an entity will be defined as follows.

- An entity is defined as a firm or group of firms under common ownership or control.

^{*} Although LECs are not formal "purchasers" of FG B or FG D access, these guideline do not preclude LECs from being assigned CICs.

New switched access arrangements may be identified which will supplement or supplant FG B and/or FG D. CICs will likely be required for some or all of these new arrangements.

Franchise operators are those individuals, groups, or firms granted the right or license to market a company's goods or services in a particular area. As there is a commonality of economic interest in marketing conditions normally imposed on a franchise operator by the franchisor, these industry guidelines treat the franchisor as the relevant entity and not each individual franchise operator. The franchisor is eligible for CICs assigned to an entity up to the maximum number as determined by these guidelines. The franchise operators operating under the common franchise may each use the CICs under the guidance of the franchisor. On the assumption that franchise operators are operating in different territories, as may be dictated by the franchisor, no technical limitation on access service exists due to this CIC limit.

1.4 Administration of CICs and CIC Usage Reporting

The assignment and management of CICs will be administered by the North American Numbering Plan Administrator (NANPA). At the direction of the NANPA, the access providers and the entities who are assigned CICs will be requested to provide access and usage information to the NANPA, on a quarterly basis to ensure effective management of the CIC resource. (Holders of codes may respond to the request at their own election). The NANPA will use this information, not only to effectively manage the use of CICs, but also to advise the industry as to the level of assignments, and to alert the industry to any concerns, such as the potential for code exhaust.

Further detail regarding these reports, including the suggested format and the address to which they should be submitted are shown in Appendix A.

1.5 The Current CIC Pool

Currently, CICs are drawn from a pool of 969 three digit codes. Both FG B and FG D assignments are made from this single pool, such that an assignment of a code for use solely for FG B or FG D use precludes the use of that code by another entity for the alternate access arrangement.

1.5 The Future CIC Pool

The introduction of four digit FG B codes will occur first, followed after some time by the introduction of four digit FG D codes. Concurrent with the expansion of FG B CICs from three to four digits, FG B and FG D CIC resources will be split into two separate assignment pools. One pool will contain the four digit FG B resource; the other pool will contain the three digit FG D resource.

At a pre-designated date (See Section 2.1), the FG B CIC format will be expanded to four digits. The expansion will provide a pool of approximately 9,000 codes and is necessary in light of the potential exhaust of the three digit codes and the subsequent inability -- if no expansion were to take place -- of access suppliers to provide access services to new entrants. (Note: Only 9000 four digit FG B CICs are available for assignment because switches do not differentiate between CICs in the OXXX and IXXX ranges. If, in the future, changes in technology allow the distinction between 4 digit FG B CICs of the form OXXX and IXXX, separate assignment of those CICs will be considered).

With split pools, FG B and FG D assignments will be made separately. Accordingly, an entity whose needs demand the use of FG B access only will be assigned a FG B CIC, leaving the corresponding FG D CIC available for use by an entity whose needs require only FG D access. (See Section 3.5 for information on matching of F6 B and FG D CICs).

At a later pre-designated date, to be determined by the industry and based upon the exhaust of FG B codes, the FG D CIC pool will convert to a four digit resource.

2.0 INTRODUCTION OF FOUR DIGIT CODES

2.1 four Digit F6 B CICs

When the NANPA assigns the 900th three digit CIC, it will advise the industry of the date at which it intends to separate the assignment of FG B and FG D CICs and begin the assignment of four digit FG B codes. Initially, four digit FG B assignments will be made from a single specific 1000s block. The first 1000s block from which four digit FG B CICs will be assigned will be the 5000s block, followed by the 6000s block. (The selection of the 5000s and 6000s block will permit matching assignments to four digit FG D codes, when such codes become available. (See Section 3.5). Subsequent assignments will be made from the remaining blocks of numbers which will be opened sequentially, starting with the 2000s block, i.e., 2000, 3000, 4000, 7000, etc. Opening of a subsequent thousand blocks is dependent solely upon the exhaust of the current available FG B CIC resource.

The NANPA will monitor CIC assignments and usage and provide reports to the ICCF indicating the level of assignment and projecting the time of exhaust of the current pool of FG B CICs based on the then current assignment rate. The NANPA will formally notify the industry 2-1/2 years prior to the need for the next 1000s block of FG B CICS. Actual assignment of the new FG B 1000s block will begin six months before the projected exhaust of the current FG B CIC pool.

The industry will review the need, in the future, to continue to restrict assignment of FG B CICS to specific 1000s blocks. The industry will determine if, when technically practicable, this restriction will be lifted, and FG B four digit assignments will be available from the full range of (9,000) fg b cics.

2.2 Four Digit FG D CICs

At the time FG D CICs are expanded to four digits, a permissive period will exist which will permit the use of both the 10XXX and 101XXXX CAC dialing formats. During this permissive period, four digit FG D CICs will be assigned in the 5000 and 6000 number blocks. (Note: Industry consensus has not been reached on the length of the permissive period. The FCC was notified of the lack of consensus in a letter from the NANP Administrator to Richard M. Firestone, Chief of the Common Carrier Bureau, dated October 13, 1989.)

In the future, it is the intent of the industry to open all four digit FG D 1000s blocks for assignment. The industry will review this intention to verify if all four digit FG D codes will be made available for assignment, or if it is necessary to restrict such availability to specific 1000s blocks.

2.3 Integration of Three Digit and Four Digit CICs

Three digit FG B CICs will change to a four digit format by incorporating the existing W digit, either a 0 or 1, as the lead digit. That is, a three digit FG B CIC with W=0, will become FG B CIC OXXX and FG B CIC with W=1, will become FG B CIC IXXX. New FG B CICs will be initially assigned in the 5000s block as stated previously. The structure of the FG B CAC is not affected by this change and, therefore, a transition period and associated permissive dialing period is not required for FG B expansion. Accordingly, with the introduction of four digit FG B CICs, all FG B CICs will be four digit codes.

Three digit FG D CICs will change to a four digit format with the use of a leading "O". That is, an existing three digit FG D CIC XXX will become a four digit FG D CIC of the form OXXX. As stated (Section 2.2) a permissive period, which permits the use of both three digit and four digit FG D codes and the corresponding 10XXX and 101XXXX CACs, will be required for FG D expansion. Ultimately, only four digit CICs and the 101XXXX CAC will be permitted.

2.4 Contingency Plan for the Introduction of Four Digit CICs

Four digit FG B or FG D CICs may be available for assignment prior to the exhaust of the three digit codes. This availability is based on the capability, in some EC areas, to process four digit FG B or FG D calls before that capability is generally available nationwide. Accordingly, an entity may elect assignment of a four digit FG B or FG D CIC for use within a specific, four digit capable EC area. This option can be exercised, therefore, whenever technically possible prior to the exhaust of three digit FG B or FG D CICs with the following understanding:

The four digit FG B or FG D code assignment prior to three digit FG B or FG D exhaust is a voluntary agreement which may be used only in those areas technically capable of processing a four digit FG B or FG D CIC.

3.0 ASSIGNMENT PRINCIPLES

3.1 General

Entities purchasing FG B or FG D access will be assigned a CIC from the appropriate pool. A request for FG B or FG D access must have been made before an entity's request for the issuance of a CIC will be considered. Assignments will be made consistent with all regulatory directives such as the standing FCC mandate which directs that access be available to all customers, not only traditional carriers. CICs will be assigned on a World Zone I basis; i.e., there will be no duplicate assignments segregated by geographic region and, therefore, an entity can use the assigned code throughout World Zone 1.

3.2 Procedures for Obtaining a CIC Assignment

An entity should typically use the following procedure when requesting a CIC assignment.

- a) Contact an access provider, i.e., the local exchange carrier, and request the assignment of a CIC.
- b) Place a valid order for FG B or D access service (depending on the type of CIC being requested) with the access provider, indicating in order of preference, three CIC choices.
- c) Provide to the access provider a list of all CICs currently held by the entity (see Section 1.3 for definition of entity), indicating the name of the firm(s) holding the CIC(s) if other than the entity applying for the CIC.

After receipt of a request for a CIC, the access provider will apply to NANPA for a CIC on behalf of the entity using appropriate forms for this purpose, attaching a copy of the written request for access service. NANPA will assign a CIC within 10 working days of receipt of a CIC request from the access provider, and notify the access provider and the entity in writing of the assignment. Entity code preference will be honored to the extent possible, and assignments will be made in the order the requests are received.

3.3 Assignments for IRCs and INCs

International Carriers (INCs) and International Record Carriers (IRCs) will be assigned CICs from the same resource pool as all other access customers. That is, there will be no special block of CICs reserved for code assignments to either INCs or IRCs.

There will be no specific allocation of codes for international services of an entity engaged in both domestic and international carriage.

3.4 Reservation of Codes

There will be no reservation of CICs. Rather, CICs will be assigned on a first come, first served basis, as access service is ordered. The NANPA will honor an entity's request for a particular code to the extent possible, and assignments will be made in order, as requests are received.

3.5 Matching of FG B and FG D CICs Prior to the Availability of Four Digit FG D Codes

An interim matching process will be available, however, to cover that period of time after the start of the assignment of four digit FG B CICs, but before the availability of four digit FG D codes. (This process will not be available for four digit FG B codes which begin with a O or a 1). Specifically, during this time FG B assignments will be made from the four digit pool but FG D assignments will continue to be made from the three digit pool. Accordingly, the assignee of a four digit FG B code will not have the opportunity to concurrently request of the administrator and be assigned the matching four digit FG D CIC. To provide to the assignee the opportunity to request the future assignment of the matching four digit FG D code, the following reservation process will be available:

Entities requesting the assignment of a four digit FG B CIC may request the reservation of the matching four digit FG D code. Absent a specific request for the reservation of the matching four digit FG D code, no such reservation will be assumed or honored.

The matching of a code will be valid from the FG B expansion date up to, but no later than six months after the corresponding four digit FG D thousands block is opened.

Matching will be honored only if the four digit FG B CIC is still assigned; i.e., it has not been returned to the assignment pool.

The NANPA will inform, by letter, those entities with matching requests notifying them of the matching date of the opening of the corresponding FG D thousands block and indicating that the assignment of the code will be effective as of that date. The access service criteria associated with the assignment of CICs, described in Section 5, will govern the entity's responsibility for connecting service.

Entities may choose not to request the matching FG D assignment. Naturally, if no matching request is made, the NANPA will not specifically inform the entity of the opening of the corresponding FG D thousands block.

Entities acquiring four digit FG B CICs through merger or acquisition or other transfer mechanisms during this period will maintain the FG D matching request, if such a matching request was, in fact, made.

3.6 Matching of FG B and FG D CICs Following the Availability of Four Digit FG D CICs

With the expansion of FG B CICs to four digits, the NANPA will administer the FG B and FG D CICs from separate pools. There will be no linkage (that is, implied reservation) between post expansion four digit CICs assigned for FG B or FG D access service. Specifically, an entity purchasing both FG B and FG D service must order the FG B and FG D CICs separately. Moreover, there is no guarantee that the CICs for FG B and FG D service will be the same code. The NANPA will however, make every effort to assign matching FG B and FG D CICs when requested to do so, given that such matching codes are available.

4.0 MAXIMUM NUMBER OF CODES

4.1 Pre-Four Digit FG B Assignment Practices

In the three digit CIC environment, each entity was allowed a maximum of three codes, a primary code and an additional two supplemental code assignments. (Note: Entities using a CIC for international traffic were allowed a maximum of four CICs; a primary code, an international code, and two supplemental codes). Since the introduction of conservation in March of 1989 (see Section 7), no further supplemental CIC assignments are allowed and new entrants can receive only a single CIC assignment.

Entities holding greater than three CICs are encouraged to make a good faith effort to return those codes using the voluntary code return process described in Appendix B. (See also Section 5.4).

4.2 Post-Four Digit FG B - Pre-Four Digit FG D Assignment Practices

With the introduction of four digit FG B CICs and the expansion of the FG B CIC pool to include 9000 FG B CICs, but prior to the introduction of four digit FG D CICs, a maximum of 5 FG B CICs can be assigned per entity. During this period, FG D assignments to new entrants (i.e., any entity holding no FG D codes) will continue in the conservation mode (only one FG D CIC per entity) until the expansion of the FG D resource to four digits.

Entities holding CICs in excess of the maximum of 5 FG B and 3* FG D codes are encouraged to make a good faith effort to return those codes using the voluntary code return process described in Appendix B. See also Section 5.4.

4.3 Post-Four Digit FG D Assignment Practices

With the introduction of four digit CICs and the expansion of the CIC pool to include 9,000 FG B CICs and 10,000 FG D CICs, a maximum of 5 FG B CICs and 6 FG D CICs will be assigned per entity.

Entities holding CICs in excess of the maximum of 5 FG B and 6 FG D codes are encouraged to make a good faith effort to return those codes using the voluntary code return process described in Appendix B. See also Section 5.4.

4.4 Special Use Code Assignments

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It is recognized that extraordinary and infrequent situations may arise where an entity, whose intent was to offer a service without the use of a CIC, is required to use a CIC because of a technical constraint in the access provider's network. With the introduction of 4 digit CICs, if the entity and the access provider agree that a CIC assignment is warranted because of such a technical constraint, and both parties also agree that no available technical alternative exists to provide the proposed service, the access provider and the entity will submit a jointly signed letter to the NANPA requesting the assignment of a "special use" CIC.

This "special use" code assignment procedure can take place prior to, or after, an entity reaches the maximum assigned limit of CICs. The "special use" CIC assignment from the NANPA WILL NOT be counted in the assigned CIC total of the entity or the access provider. The NANPA will, in each such case, notify the FCC of its intention to make the requested assignment and will abide by any instructions it receives from the FCC thereafter.

If an alternative to the use of a CIC subsequently becomes available (i.e., there is no longer a technical constraint in the access provider's network), the voluntary return of the "special use" code is encouraged (see Section 5.4). Moreover, if, after it has been established that there exists a technical alternative to the use of the code, and the entity chooses not to return it, the CIC WILL be counted against the limit of assignable codes.

^{*} NOTE: Entities assigned 3 FG D CICs prior to the conservation mode may continue to use those codes or take advantage of the voluntary return process.

An entity can be assigned a maximum of two "special use" CICs. It is expected that such codes will be required infrequently and that few "special use" codes will be assigned. The industry will review the category of "special use" CICs annually, but will meet at the time the NANPA assigns the second "special use" code to a specific entity in order to examine the needs which required the assignments and, if necessary, to consider a change to the assignment limits.

4.5 CIC Limit Review

The number of CICs assignable per entity will be reviewed annually, beginning one year after the introduction of four digit FG B codes, or when needed as determined by the industry. It is intended that these reviews investigate the potential for further expansion of the number of codes per entity.

5.0 Disposition of Codes

5.1 Requirement for Code Retention

It is expected that CICs, when assigned, will be placed in service within a reasonable time. Specifically, access service associated with the CIC must be obtained, and the CIC must show usage. Absent such service and usage, a reclamation process will be initiated consistent with Sections 5.2 and 5.3.*

5.2 Requirement for Access

If access service associated with a CIC has not been established within four months of the date of code assignment, the NANPA will inquire regarding the status of the CIC and, if appropriate, a certified letter will be sent to the entity initiating the reclamation process. The letter will state that the NANPA intends to reclaim the CIC at the end of a 60 day period if access service has not been established. The entity will also be notified by letter if the code assignment is withdrawn.

Any code reclaimed will be made available for assignment by the NANPA after an idle period of at least six months.

Reclamation Process: The procedure whereby NANP administration, as maintenance agent for the CIC assignment guidelines, recovers codes which do not meet the requirements specified in the guidelines. (Note: NANP administration has the responsibility to attempt to recover numbering resources, especially unused numbering resources, as the situation requires. These guidelines confer no enforcement authority. Actual enforcement authority resides with the appropriate governmental or regulatory body.)

5.3 Requirement for Usage

If, after a CIC is in service, there is no usage associated with that code for two consecutive quarters, the NANPA will inquire regarding the status of the CIC and, if appropriate, initiate the reclamation process. No usage is defined as no minutes of use, with test calls not included in the usage total.

5.4 Voluntary Return of CICs

The voluntary return of CICs which are no longer needed by an entity is encouraged. In fact, a process by which such a return can be efficiently effected, is described in a separate set of guidelines. Those guidelines, entitled "Procedures for the Voluntary Return of Carrier Identification Codes to the North American Numbering Plan Administrator" are attached to this document as Appendix B.

Any code returned by an entity will be made available for assignment by the NANPA after an idle period of at least six months.

6.0 ENTITLEMENTS

5.1 Code Use

Assignment of a CIC provides the "right" to use and retain the CIC consistent with these guidelines, to promote the use of the CIC as part of the carrier access code (CAC) for end user dialing, and to transfer the code to another entity as described in Section 6.2. Franchise operators do not retain any right to the CICs if the franchisor ceases operation or determines that its CICs are no longer required.

6.2 Transfer of CICs

The assignment of a CIC does not imply ownership. Although not a formal asset of an entity, a CIC may be transferred to another entity through merger or acquisition as long as the CIC is in use, i.e., FG B or FG D access is being reported or can be verified by an access provider. The NANPA must be informed of such transfers to ensure that an accurate record of the entity responsible for the CIC can be maintained, and that the guidelines requirements are satisfied. Such requirements include those associated with the retention of CICs, and transferred CICs will be subject to reclamation as are any other codes.

7.0 CONSERVATION

7.1 The Need for a Conservation Mode

Conservation involves efforts to preserve the availability of codes. A conservation mode and the restrictive assignment policies associated with it slows the assignment rate, conserves the dwindling resource, and allows the industry time to circumvent the possibility of exhaust.

The assignment level at which a conservation mode is invoked, therefore, must provide adequate time for the industry to plan for the accommodation of additional entities, develop and publish the necessary associated technical documentation describing the plan, provide the necessary software/hardware modifications to the necessary network elements, and deploy those modifications throughout the nation. It is estimated that these efforts require at least five years.

7.2 Conservation Rules for the Three Digit CIC Environment

Conservation Rules established for the three digit CIC environment, which remain in effect, invoke specific measures upon the assignment of the 700th 3 digit CIC. At that time (which occurred in March, 1989), no further supplemental codes can be assigned. Accordingly, new entrants will be assigned only one code. Those entities holding less than the maximum of 3 CICs will not be assigned additional supplemental codes.

7.3 A Conservation Mode for the Four Digit CIC Environment

A detailed conservation plan for the four digit CIC environment will not be described in these guidelines. Rather, the NANPA, as administrator of CIC assignments, will monitor the assignment rate and level, predict the potential for exhaust, and report its findings to the industry. With this information supplied by the NANPA, the industry can determine the need for a formal conservation mode and its associated measures.

Those measures might include restrictions on the maximum number of code assignments per entity, an aggressive effort, beyond that already in place, for code reclamation, and the convening of an ICCF sponsored committee to begin the necessary planning to accommodate the need to assign more than 9,000 FG B and/or 10,000 FG D CICs.

REQUIREMENTS FOR QUARTERLY LOCAL EXCHANGE CARRIER (LEC) AND ENTITY ACCESS/USAGE REPORTS

To assist in the administration of Carrier Identification Codes (CICs), LECs and entities are requested to provide CIC access and usage information each quarter to North American Numbering Plan administration (NANPA). The access/usage reporting requirements described below have been developed for use by the LECs and entities in preparing the quarterly reports.

A. LEC Reporting Format Requirements

The requirements for the LEC quarterly access/usage reports include the ability to submit the reports in machine readable form, i.e., on computer diskettes (3 1/2" or 5 1/4"). LECs providing Feature Group A (FGA), Feature Group B (FGB) and/or Feature Group D (FGD) service, particularly the Bell Operating Companies and those LECs with greater than 30 CICs in their serving area, are strongly encouraged to submit their reports on diskette to reduce the effort required for data entry and to facilitate CIC analysis by NANPA and the FCC. The format for the data to be presented on diskette is described below. To assure compatibility with NANPA and FCC data entry software, LECs submitting quarterly reports on diskette must use this format.

The following rules shall apply when providing quarterly reports on diskettes:

a. The format for each record will consist of one ASCII text line with each field separated by a comma "," delimiter. The delimiter shall not be considered part of any field.

b. One record shall be provided for each CIC and for each state where service is provided by the LEC

c. The maximum line length (including comma delimiters) for each record is \$8 characters.

d. All fields must be represented in each record. That is, if information for a field is not available or is blank, e.g., some entities do not have an ACNA, a delimiter will immediately follow the previous delimiter, i.e. ",," to indicate this lack of information.

e. To avoid confusion with the comma delimiter, no commas shall be part of the data in any field, particularly in the entity name field where it is common to follow the entity name with, Inc.

Each record shall consist of the 11 fields shown below. Minimum and maximum lengths are specified for each field. A minimum field length of "0" implies the information is unavailable or blank. A record will consist of a sequence of fields following the order shown below, i.e., cic, ename, acna, ...

| FIELD | | | LENGTH | |
|----------------|---|------|--------|-----|
| NAME | DESCRIPTION | TYPE | MIN | MAX |
| cic | Carrier Identification Code | Text | 0 | 4 |
| ename | Entity name | Text | 0 | 40 |
| acna. | Access Carrier Name Abbreviation | Text | 0 | 3 |
| fgb_statw | Feature Group B Trunk Access & "W" digit | Text | 1 | 2. |
| fgd_stat | Feature Group D Trunk Access | Text | 1 | 1 |
| fga_use | Feature Group A Usage | Text | 1 | 1 |
| fgb_usc | Feature Group B Usage | Text | 1 | 1 |
| | Feature Group D Usage | Text | ī | 1 |
| fgd_use loc | Name of state in which service exists, using standard 2-character postal codes (e.g., NJ) | Text | 2 | 2 |
| up_date | Last date that a change was made on the record | Text | 0 | 8 |
| ecu ccu | Abbreviated Exchange Carrier Name (e.g., SWBT) | | 2 | 15 |

Attachment A is a sample of how LEC data records would appear in tabular form. Included on Attachment A are the field definitions and the permissible field entries.

B. Entity Reporting Format Regulrements

The quarterly report format for entities with CICs will be similar to the LEC reports shown on Attachment A, with several exceptions. Entitles are not requested to provide the reports in machine readable format on diskettes nor should Feature Group A information be provided. The "LOCATION" field has been changed to "LEC ACCESS", which should include the names of all LECs where access has been obtained for each CIC. Attachment B is a sample report for FGB and FGD trunk access and usage information to be provided by an entity with CIC(s). Included on Attachment B are the field definitions and permissible field entries. Attachment C is a blank form for use by entities in submitting a quarterly report.

C. General Requirements

- 1. For reports provided by LECs, a single report shall be submitted combining any information from subsidiaries within the LEC, e.g., the Bell Operating Companies shall provide a single report combining information from all the Operating Companies within the region. For other LECs, one report, nationwide, shall be provided. Also, for reports provided by entities, one report shall be provided for the entity, nationwide.
- After FGB and FGD CICs are expanded to 4-digits, LECs and entities will report all CICs in a
 4-digit format in the quarterly reports. For example, 3-digit FGB CIC 544, with the W digit =
 1, will be indicated on the report as CIC 1544. All 3-digit FGD CICs will be preceded by a
 "0" in the 4-digit format, e.g., FGD CIC 345 should be reported as 0345.
- 3. In their quarterly reports, entities shall provide information on entity name, contact person, address, and telephone number. NANPA will use this information to update its contact database.
- 4. LEC and entity reports shall be submitted to the NANPA on a quarterly basis. The reports are due one month following the close of each quarter. For example, first quarter reports are due on or before April 30th. The quarterly reports are to be submitted to:

J. N. Deak NANP Administration Room 1B-228 290 W. Mt. Pleasant Ave. Livingston, NJ 07039

Revised 6/17/92

ATTACHMENT A

LOCAL EXCHANGE CARRIER ACCESS/USAGE QUARTERLY REPORT

| Local Excl | hange Carrier | • | | | | Date | | |
|------------------|---------------------|-------------------|---------|---|---|-------------|-----------------------|-----------------------|
| CIC ¹ | ENTITY ² | ACNA ³ | TRUNK A | | | USAG FGB | e ⁵ FGD | LOCATION ⁶ |
| 010 | ABC Company | ABC | 1 | D | Y | Y | N | TX |
| 010 | ABC Company | ABC | A1 | Ā | Y | Y | N | AZ |
| 010 225 | Universal Telcomm | UTI | D0 | Y | N | N | Y | AZ |
| 225 | Universal Telcomm | UTI | 0 | Υ | N | Y | Y | TX |
| | LGR, Inc. | LGR | N | N | Y | N | N | NM |

Field Descriptions:

- 1. CIC-A 3 or 4-digit Carrier Identification Code assigned by the North American Numbering Plan administration (NANPA). Every CIC sesitions within the LEC's billing system should be reported. In the event an entity has PGA service but does not have a CIC, leave the CIC field blank.
- 2. ENTITY- The name of the company that has purchased access, usually shown in the Access Carrier Name field on the billing record.
- 3. ACNA- A 3-character Access Carrier Name Abbreviation as shown in the ACNA field on the billing record. Leave blank if no ACNA is provided.
- 4. TRUNK ACCESS- Indicates if PGB and PGD trunks are in service in the UEC (i.e. installed) by using the designations shown below. This information should be derived from the LEC billing system (e.g., CABS). Changes in PGB or PGD trunk access from the previous quarterly report shall be indicated, using the designations shown below, only for new trunk access, or for complete disconnect of trunk access.
- •5. USAGE- indicates there are minutes of use (i.e., MOU>0) for PQA, PGB and/or PGD in the LEC's billing system using the designation Y = Yes or N = No. The actual minutes of use should not be reported. Indication of usage changes from the previous quarterly report is not required.
- 6. LOCATION- Refers to the state where the CIC has access as described in the Trunk Access field using standard 2-character postal codes (e.g., NI). A separate line (i.e., record) should be provided for each state where the CIC has PGB or PGD trunk access.

Permissible Trank Access Designations:

FGB

1 = PGB trunk access with "1" as the W digit (i.e., 950-WXXX), no change from previous report

0 = PGB trunk access with "0" as the W digit, no change from previous report

Y = FGB trunk access, no change from previous report

N = No FGR trank access, no change from previous report

A0 = PGB trunk access activated since the previous report with "0" as the W digit

A1 = FGB trunk access activated since the previous report with "I" as the W digit

100 = 1-till hunk access disconnected since the previous report with "0" as the Widgit

1) = 1711 hunk success disconnected since the previous report with "1" as the W digit

FCD

Y = FGD trunk access, no change from previous report

N = No FGD trunk access, no change from previous report

A = PGD trunk access activated since the previous report

D = PGD trunk access disconnected since the previous report